

## REMARKS AND ARGUMENTS

### I. Objections to Specification

The Specification was objected to due to grammatical errors. Amendments to Specification are made and are separately attached in both marked and clean version herewith to overcome the objection.

### II. Objections to Claims

The Claims 8 –13 were objected to due to lacking antecedents. Amendments to the above Claims are made by incorporating into claim 1 the missing antecedents of claims 8 – 13, and are separately attached herewith to overcome the objection.

### III. Rejection of Claims under 35 USC 102 (b)

Examiner has rejected Claim 1 under 35USC 102(b) as being anticipated by Holzer et al. (U.S. Patent 6307316).

Based on the U.S. patent law, *a claim is anticipated only if element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. In addition, the elements in the prior arts must be arranged as required by the claim.*

Claim 1 in the current amendment has been amended to overcome 102 (b) rejection by including distinguishing features of the instant application, as disclosed originally in the specification.

#### IV. Rejection under the 35 U.S.C. 103

Examiner rejects claims 6, and 7 –13 under 103(a) as being unpatentable over Itou (US 4869698), in view of Soulard (EP 0133831). While claims 15 –16 are rejected under 103(a) as being unpatentable over Itou (US 4869698), in view of Holzer (US 6307316).

Based on the U.S. patent law to establish a prima facie of obviousness, the motivation for combining or modifying references cannot be a hindsight reconstruction of the subject claimed matter based on Applicant's own disclosure, see, *In re Oetiker*, 24 U.S.P.Q 2d 1443, 1446 (Fed. Cir.1992). To establish a prima facie case of obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Based upon the fact that the currently amended claim 6 - 13 and 15 -16 are dependent upon claim1 , while claim 1 can be patentably distinguished from both Itou (US 4869698), Holzer (US 6307316) and Soulard (EP 0133831), claim 6 –13 and 15 –16 can thus be patentably distinguished from cited arts.

In light of the foregoing, it is believed that the present invention is in condition for allowable. And Applicant respectfully requests that a timely Notice of Allowance be issued in this case. If the Examiner has any question, he or she is invited to call or fax Applicant's counsel at the telephone number below.

Respectfully Submitted.

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